

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

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STATE OF TEXAS, et al.,

Plaintiffs,

v.

UNITED STATES OF AMERICA, et al.,

Defendants.

and

KARLA PEREZ, et al.,

Defendant-Intervenors

and

STATE OF NEW JERSEY,

Defendant-Intervenor.

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CASE No. 1:18-CV-00068-ASH

**UNOPPOSED MOTION FOR LEAVE TO FILE BRIEF OF AMICI CURIAE CURRENT  
AND FORMER PROSECUTORS AND LAW ENFORCEMENT LEADERS IN  
SUPPORT OF DEFENDANTS-INTERVENORS**

Proposed Amici Current and Former Prosecutors and Law Enforcement Leaders respectfully move this Court for leave to file the attached amici curiae brief in support of Defendants-Intervenors. The proposed brief is submitted with this motion.

This Court has broad discretion to grant leave to file amicus briefs. *United States ex rel. Gudur v. Deloitte Consulting LLP*, 512 F. Supp. 2d 920, 927 (S.D. Tex. 2007). When determining

whether leave should be given, the Court considers, among other things, “whether the proffered information is ‘timely and useful’ or otherwise necessary to the administration of justice.” *Id.*

Counsel for the Plaintiff States, Federal Defendants, and Defendants-Intervenors consent to the filing of this brief.

### **I. Interest Of Proposed Amici**

Proposed Amici are current and former individual police chiefs, sheriffs, and law enforcement leaders. Proposed Amici have deep and wide-ranging expertise in local law enforcement and in cooperative federal-state law enforcement activities. They are intimately familiar with the challenges of performing critical law enforcement functions in communities where immigrants fear the police and are vulnerable to exploitation and crime. Proposed Amici therefore have an interest in the present litigation as it pertains to the members of their communities who live and work under Deferred Action for Childhood Arrivals (“DACA”).

### **II. Proposed Amici’s Brief Is Useful To The Court**

In their accompanying brief, Proposed Amici supplement Defendants-Intervenors’ pleadings by drawing on their knowledge and experiences with local law enforcement practices and effective policing. In particular, Proposed Amici explain that DACA improves public safety by encouraging community cooperation with police, an essential element to effective policing and improving public safety. Proposed Amici also demonstrate that DACA provides individuals with the opportunity to obtain verified and secure identification, which aids law enforcement in carrying out its day to day duties. The information presented by Proposed Amici will aid the Court in assessing the present motions.

### III. Conclusion

Proposed Amici respectfully request that this Court grant this motion, allow them to participate as amici curiae, and accept for filing the brief submitted with this motion.

July 21, 2018

Respectfully Submitted,

/s/ Chirag G. Badlani

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of BRIEF OF AMICI CURIAE CURRENT AND FORMER LAW ENFORCEMENT LEADERS was served on July 21, 2018 via this Court's ECF filing system, whereupon all counsel of record were served.

/s/ Chirag G. Badlani